

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOHN WILSON,

Plaintiff,

- against -

FEDERAL BUREAU OF INVESTIGATION,

Defendant.

20 Civ. 10324 (LAK) (SDA)

**DECLARATION OF  
KATHERINE “Q” ADAMS  
IN SUPPORT OF PLAINTIFF’S CROSS-  
MOTION FOR SUMMARY JUDGMENT  
AND OPPOSITION TO DEFENDANT’S  
MOTION FOR SUMMARY JUDGMENT**

KATHERINE “Q” ADAMS, an attorney duly admitted to practice law in the State of New York and in this court, declares under penalty of perjury:

1. I am an associate at Beldock Levine & Hoffman LLP, attorneys for Plaintiff and am well-familiar with the facts of this case. I submit this declaration in support of Plaintiff’s motion for summary judgment and opposition to Defendant’s motion for summary judgment.
2. Annexed hereto are true and accurate copies of the following exhibits:
  - a. **Exhibit A:** Affidavit of John Wilson, dated November 15, 2021.
  - b. **Exhibit B:** Plaintiff’s First Request, dated June 14, 2013.
  - c. **Exhibit C:** Defendant’s Response to First Request, dated January 29, 2014.
  - d. **Exhibit D:** Plaintiff’s Second Request, dated March 26, 2014
  - e. **Exhibit E:** Defendant’s Response to Second Request, dated September 25, 2014.
  - f. **Exhibit F:** Plaintiff’s FOIA Appeal, dated November 6, 2014.
  - g. **Exhibit G:** DOJ’s Response to Plaintiff’s FOIA Appeal, dated February 23, 2015.
  - h. **Exhibit H:** Plaintiff’s Third Request, dated October 23, 2019.

- i. **Exhibit I:** Defendant's Response to Plaintiff's Third Request, dated October 29, 2019.
- j. **Exhibit J:** Defendant's Production, dated April 2, 2021.
- k. **Exhibit K:** Eagle Security Group Expert Report, dated November 15, 2021.

Dated: November 15, 2021  
New York, New York

Respectfully submitted,

BELDOCK LEVINE & HOFFMAN, LLP  
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New York, New York 10016  
*Attorneys for Plaintiff*

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